

Exhibit 25

<p>1 experts to decide. But I assume that -- that the 2 answer is yes. 3 MS. FEEMAN: Let's mark the report. So 4 I'd like to mark as Exhibit 5139 the report of 5 Dr. Itamar Simonson. 6 (Exhibit 5139 was marked for identification by 7 the court reporter and is attached hereto.) 8 Q. (By Ms. Feeman) And Dr. Simonson, could you 9 please first take a look at Exhibit 5139 and confirm 10 that this is the report that you submitted in this 11 matter. 12 A. It appears to be. 13 Q. So if you could please turn to 14 paragraph 14, which is on page 5 of Exhibit 5139. 15 So the -- the pertinent issue that you 16 were trying to examine in this case or test, when 17 you were doing your survey, is basically set forth 18 in paragraph 14, correct? 19 A. Paragraph 10 and paragraph 14, yes. 20 Q. And in paragraph 14 you say that one of 21 the questions that's to be decided in this case -- 22 so the issue in this case -- is "to what extent 23 Google's decision to use the Java programming 24 language, and more specifically the structure," and 25 "sequence, and organization and declaring code in</p> <p style="text-align: right;">Page 82</p>	<p>1 decisions, such as committing to, say, the Android 2 platform, the considerations are very basic. They 3 go back probably thousands of years. Sales and 4 profits, they have no change -- they don't change 5 from 2007 to 2010 to 2015. They just don't change. 6 They're all -- we are in business -- or companies 7 are in business to make a profit. That's usually 8 the primary goal. 9 Therefore, asking people about their 10 motive today or in 2010, or in 2007, you will 11 expect to get the same results, more or less. 12 If I may just complete my answer. 13 Q. I'm listening. 14 A. Indeed, if you look at the provided 15 reasons of those 152 respondents across the years, 16 say, between 2007 and 2015, you don't find 17 differences. 18 There are no more mentions of Java 19 between 2007 -- for those who started between 2007 20 and 2009, and those that started later. There are 21 no more mentions of Java. It's -- it's quite 22 simple. 23 So in that regard, given the nature of 24 the decision, people will have a good memory for 25 that. Moreover, the reasons are stable. If there</p> <p style="text-align: right;">Page 84</p>
<p>1 37 Java API packages ("the Accused APIs") in 2 Google's Android operating system drove (as Oracle 3 contends) the choices or decisions of application 4 developers to develop Android applications, and 5 consequently, the success of Android in the 6 marketplace." 7 Is that correct? 8 A. Right. 9 Q. So that's the issue you were trying to 10 explore? 11 A. Yeah, that would -- that's certainly a 12 central part of it. 13 Q. Okay. And so by testing whether the 14 operating system drove the developers' choices and 15 consequently the success of Android in the 16 marketplace, you need to be looking at the time 17 Android was first released into the market, 18 correct? 19 MR. PURCELL: Object to the form. 20 THE DEPONENT: No. That's just part of 21 it. 22 Q. (By Ms. Feeman) But what is meant by "drove 23 the choices, and consequently, the success of Android 24 in the marketplace"? 25 A. For decisions like that, high-involvement</p> <p style="text-align: right;">Page 83</p>	<p>1 is any difference, is that the number of users or 2 expected growth were even more important early on, 3 because today there are I think 1.9 million 4 applications. 5 So let's say I want to introduce a new 6 calendar app for Android. I'm competing with -- I 7 don't know -- how many other calendar apps. So 8 today demand is much more limited and I believe 9 that most apps are unsuccessful. 10 Back then, the expectation that Android, 11 supported by Google, will be successful, if 12 anything, if there was any difference, it was more 13 important. 14 Q. Are you done? 15 A. I'm done. 16 Q. So you came into this survey with the 17 preconceived notion that businesses make decisions 18 to make a profit and that's it; isn't that correct? 19 MR. PURCELL: Object to the form. 20 THE DEPONENT: No, I don't -- I'm not 21 sure where you heard that. I said profit is an 22 important motive of businesses, in general. 23 It's -- 24 Q. (By Ms. Feeman) In fact, for the last -- 25 MR. PURCELL: Wait, wait, wait, wait.</p> <p style="text-align: right;">Page 85</p>

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<p>1 biased methodology?</p> <p>2 A. Yes.</p> <p>3 Q. And another flaw that can impact the</p> <p>4 results of a survey is using leading questions that</p> <p>5 suggest the correct answers?</p> <p>6 A. Correct.</p> <p>7 Q. And another potential pension flaw is</p> <p>8 using inappropriate controls?</p> <p>9 MR. PURCELL: Objection.</p> <p>10 THE DEPONENT: Where a control is needed,</p> <p>11 an inappropriate control can be a serious problem.</p> <p>12 Q. (By Ms. Feeman) What are some situations</p> <p>13 where a control is needed?</p> <p>14 A. One case is when you conduct an</p> <p>15 experiment. So let's talk about -- let's come back</p> <p>16 to the example that I used earlier.</p> <p>17 As I said, we are -- let's say we are</p> <p>18 interested in whether the words all natural cause</p> <p>19 consumers to buy this juice or cereal.</p> <p>20 Then we need to control where we keep</p> <p>21 other things as similar as possible. We just</p> <p>22 eliminate the allegedly deceptive or problematic</p> <p>23 element. In that case, the words all natural.</p> <p>24 So -- but more generally, when you</p> <p>25 conduct an experiment and you manipulate an</p> <p style="text-align: right;">Page 98</p>	<p>1 for breakfast. That's a question of fact.</p> <p>2 In that case, I don't think it's leading.</p> <p>3 You just retrieve your memory and you're thinking,</p> <p>4 did I have egg for breakfast. And if you did, you</p> <p>5 say yes. If you didn't, you say no.</p> <p>6 If you want to ask a question about</p> <p>7 judgment or about something you may do in the</p> <p>8 future, I think it is good to not ask one-sided --</p> <p>9 sided question. Although there might be some</p> <p>10 exceptions.</p> <p>11 Q. (By Ms. Feeman) So who -- who -- did you</p> <p>12 write the questions in your survey yourself?</p> <p>13 A. I did.</p> <p>14 Q. And -- and so all of the words, you came</p> <p>15 up with them yourself?</p> <p>16 A. Yes.</p> <p>17 Q. So you'd agree that -- that it was your</p> <p>18 task in writing those questions to only ask</p> <p>19 questions that reasonable respondents can be</p> <p>20 expected to have reliable answers for, correct?</p> <p>21 A. Yes.</p> <p>22 Q. And that if you failed to ask the proper</p> <p>23 questions, most respondents will, nonetheless,</p> <p>24 still provide answers, but those answers would be</p> <p>25 meaningless?</p> <p style="text-align: right;">Page 100</p>
<p>1 independent variable, or more than one independent</p> <p>2 variable, you need control or controls.</p> <p>3 Another case is when you're using a</p> <p>4 leading close-ended question. For example, suppose</p> <p>5 I were to show you a box of cereal that says all</p> <p>6 natural, and I asked you, based on what you see on</p> <p>7 this box, is this cereal all natural. That is a</p> <p>8 leading question.</p> <p>9 And when you're using a leading</p> <p>10 close-ended question, you need to include -- I</p> <p>11 mean, first, you shouldn't be asking leading</p> <p>12 questions.</p> <p>13 But putting that aside, if you do ask</p> <p>14 closed-ended question, especially a leading one,</p> <p>15 you should include a control.</p> <p>16 If, on the other hand, you're using</p> <p>17 open-ended questions, like most of the questions in</p> <p>18 this survey, where you're not suggesting any</p> <p>19 answers, then a control is not needed.</p> <p>20 Q. So would -- would you agree that -- that</p> <p>21 one-sided questions can be leading?</p> <p>22 MR. PURCELL: Object to the form.</p> <p>23 THE DEPONENT: Well, it's -- it's -- it's</p> <p>24 too broad the way you asked the question.</p> <p>25 Let's say I asked you, did you have egg</p> <p style="text-align: right;">Page 99</p>	<p>1 MR. PURCELL: Object to the form.</p> <p>2 THE DEPONENT: As I said, I had concerns</p> <p>3 about question No. 8, and for reasons that I'm</p> <p>4 happy to explain to you. That was the only</p> <p>5 question where I had concerns. I could actually</p> <p>6 have conducted a survey without it, but I decided</p> <p>7 to include question 8. That was the only one that</p> <p>8 raised any potential red flags.</p> <p>9 Q. (By Ms. Feeman) But as a general matter, you</p> <p>10 would agree that if an expert fails to ask proper</p> <p>11 questions, most respondents will likely still provide</p> <p>12 answers, but those answers will be meaningless and</p> <p>13 unreliable?</p> <p>14 A. I think, in many cases, that is correct.</p> <p>15 Q. And you do understand that, generally,</p> <p>16 two-sided questions should be used in surveys,</p> <p>17 correct?</p> <p>18 MR. PURCELL: Object to the form.</p> <p>19 THE DEPONENT: Well, in numerous academic</p> <p>20 surveys I don't ask two-sided questions. As I said</p> <p>21 earlier, if I ask a question of fact, such as, did</p> <p>22 you have to learn Objective-C to develop</p> <p>23 applications -- you know, iOS applications, you</p> <p>24 don't need a two-sided question.</p> <p>25 On the other hand, if you ask something</p> <p style="text-align: right;">Page 101</p>

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<p>1 I think a shifted a couple of words. 2 But if you look at the -- at the answers 3 and explanations in -- and that's one thing I do 4 agree with Dr. Toubia, is that you see that there 5 are quite a few of them who still thought that I'm 6 asking about their ability to develop applications. 7 MS. FEEMAN: Are you guys ready to break 8 for lunch? 9 MR. PURCELL: Sure. 10 THE VIDEOGRAPHER: Going off the record 11 The time is 12:13 p.m. 12 (Recess taken.) 13 THE VIDEOGRAPHER: Back on the record. 14 The time is 1:11 p.m. 15 Q. (By Ms. Feeman) Good afternoon. 16 A. Good afternoon. 17 Q. So would you agree, Dr. Simonson, that 18 different people will recall, say, with different 19 levels of precision? 20 MR. PURCELL: Object to the form. 21 THE DEPONENT: I mean, such a generic way 22 of asking. It might be slight differences, yes. 23 Q. (By Ms. Feeman) And that -- well, that some 24 people might recall in more detail and other people 25 might recall in more general level.</p> <p style="text-align: right;">Page 122</p>	<p>1 whatever they wanted to say, so -- I mean, 2 different -- different people say different things 3 and choose different words. 4 I'm not sure I would classify it based on 5 granularity. 6 Q. (By Ms. Feeman) So did you try to do 7 anything to account, in your study, for the different 8 ways that different people recall events? 9 MR. PURCELL: Object to the form. 10 THE DEPONENT: I said -- as I indicated 11 earlier, here we're asking about a major decision 12 to embark on a new platform. That's what we call a 13 high involvement decision and people tend -- tend 14 to have a very good memory for that, for their 15 considerations. 16 Q. (By Ms. Feeman) Okay. But my question was, 17 did you do anything to account for the different ways 18 that different people might recall? 19 A. I'm not sure I understand the question. 20 What do you mean by different ways of -- 21 in which people may recall? 22 Q. So do you agree that the time frame in 23 which people may have made a decision to select a 24 new platform may have differed? 25 MR. PURCELL: Object to the form --</p> <p style="text-align: right;">Page 124</p>
<p>1 Is that one way it might change? 2 MR. PURCELL: Object to the form. 3 THE DEPONENT: You know, it's not a -- 4 it's hard for me to answer this question because 5 it's so vague and broad. Maybe you could refine 6 it. 7 Q. (By Ms. Feeman) Sure. 8 When you reviewed the results of your 9 survey, did you find that some people tended to 10 answer questions at a sort of granular level and 11 people tended to answer the questions at sort of a 12 higher level? 13 Did you see that? 14 A. I mean, people obviously use it -- use 15 different words. But aside from that, I didn't 16 notice any differences in level or granularity. I 17 mean, different people have different ways of 18 answering questions. 19 Q. So then you don't recall like some people 20 answering on a real granular level, such as there 21 was one person that -- that said she developed apps 22 because of Obamacare, which is a very granular 23 level, correct? 24 MR. PURCELL: Object to the form. 25 THE DEPONENT: She said -- he or she said</p> <p style="text-align: right;">Page 123</p>	<p>1 Q. (By Ms. Feeman) -- in your survey? 2 A. I still don't understand the question. 3 What -- what time frame are you referring 4 to? 5 Q. You had asked individuals questions about 6 when they first developed apps for, say, an Android 7 platform, correct? 8 A. Right. 9 Q. And you also asked them when they first 10 decided to develop apps for some other platform, 11 correct? 12 A. Right. 13 Q. Do you recall those? 14 Do you agree that some of the people -- 15 the answers to those questions were different. 16 Some people started to develop apps further back, 17 maybe even nine years ago. Some people started to 18 develop apps as recently as a year ago, correct? 19 A. That's correct, yes. 20 Q. Did you do anything to account for those 21 reasons, the issues? 22 A. There -- there was no need to -- to do 23 anything, so I didn't do that. As I said, these 24 are very important decisions that people tend to 25 have very good memory for, whether it was eight</p> <p style="text-align: right;">Page 125</p>

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<p>1 years ago or a year ago.</p> <p>2 Q. And did you actually interview people to</p> <p>3 discuss how important a decision this was to them?</p> <p>4 Have you ever talked to an app developer?</p> <p>5 A. Yes, I -- I talked to app developers.</p> <p>6 People that I know personally.</p> <p>7 Q. And you've talked to them about their</p> <p>8 decision to develop applications for a particular</p> <p>9 platform?</p> <p>10 A. No, I don't recall that conversation.</p> <p>11 But I think this is a major business decision. As</p> <p>12 I said, I've studied and I've taught business</p> <p>13 marketing and high-tech marketing. I know what</p> <p>14 these people generally regard as important</p> <p>15 decisions or not important decisions.</p> <p>16 Q. So you've taught a class about</p> <p>17 marketing -- about app developer marketing?</p> <p>18 A. I don't remember. I might have talked</p> <p>19 about app developments, but it's -- there are</p> <p>20 general principles that apply to app development,</p> <p>21 as they apply to numerous other decisions. So</p> <p>22 you're looking for principles and that's -- these</p> <p>23 general principles are what you teach your</p> <p>24 students.</p> <p>25 Q. So when you teach your students, you give</p> <p style="text-align: right;">Page 126</p>	<p>1 learned in the class?</p> <p>2 A. Well, hopefully, they learned the general</p> <p>3 principles which they could apply. It's not --</p> <p>4 you know, at that level, it's not something where</p> <p>5 you've just memorized some things and -- and then</p> <p>6 you repeat them, or you're tested about them in the</p> <p>7 exam just to see if you memorized the textbook or</p> <p>8 whatever.</p> <p>9 Q. So in -- in your survey in this case, one</p> <p>10 of the things that you were trying to do was to --</p> <p>11 to test whether, for example, business concerns,</p> <p>12 money concerns, caused developers to choose to</p> <p>13 develop on a platform; is that correct?</p> <p>14 A. Business concerns?</p> <p>15 Q. Yes.</p> <p>16 A. What do you mean by that?</p> <p>17 Q. Okay. One of the things that you were</p> <p>18 trying to test in this case was whether the number</p> <p>19 of users or devices that were being used by a</p> <p>20 platform would cause developers to choose to</p> <p>21 develop for that platform; is that correct?</p> <p>22 A. Yes, using open-ended question. Yes.</p> <p>23 Q. Okay. And -- and another thing that you</p> <p>24 were trying to test was whether a given programming</p> <p>25 language and familiarity with that programming</p> <p style="text-align: right;">Page 128</p>
<p>1 them exams?</p> <p>2 A. No.</p> <p>3 Q. No.</p> <p>4 A. I mean, it depends. I mean, in the --</p> <p>5 when I was teaching the core marketing class, which</p> <p>6 is the introductory marketing class, we did give</p> <p>7 them an exam.</p> <p>8 Q. When's the last time you taught that</p> <p>9 class?</p> <p>10 A. Ten years ago.</p> <p>11 Q. And do you ever notice that your</p> <p>12 students, when they took those exams, recalled</p> <p>13 materials with a different level of precision?</p> <p>14 A. No.</p> <p>15 MR. PURCELL: Object to the form.</p> <p>16 THE DEPONENT: The exam was a particular</p> <p>17 case study. So they are given -- they had a total</p> <p>18 of, say, four hours. They were given a case study.</p> <p>19 They were reading and analyzing that case study,</p> <p>20 say, for an hour and a half. And then they</p> <p>21 answered, say, three, four questions about that</p> <p>22 case study. And they had the case study in front</p> <p>23 of them. There was no issue of recall.</p> <p>24 Q. (By Ms. Feenan) So they didn't need to -- in</p> <p>25 order to do the case study, to recall what they had</p> <p style="text-align: right;">Page 127</p>	<p>1 language would cause developers to choose to</p> <p>2 develop for a platform, correct?</p> <p>3 A. Yes.</p> <p>4 Q. So when you first set out to conduct this</p> <p>5 study, how did you define the universe of</p> <p>6 developers that you were trying to -- to sample?</p> <p>7 A. People who -- or firms -- that develop</p> <p>8 mobile applications.</p> <p>9 Q. So did you have any more details in</p> <p>10 your -- your universe other than that?</p> <p>11 A. No.</p> <p>12 Q. And did you actually define that universe</p> <p>13 somewhere in your report?</p> <p>14 A. I mean, I describe them -- that's -- if</p> <p>15 you look at the screening criteria, the questions</p> <p>16 we talked about, that defines the universe.</p> <p>17 Q. And can you point -- point me to that,</p> <p>18 please.</p> <p>19 A. Sure.</p> <p>20 I mean, that's -- if you -- you can look</p> <p>21 at the tables. You can look at questions QA2,</p> <p>22 going all the way to -- to QA5.</p> <p>23 Q. Okay. So -- so do I take it that -- that</p> <p>24 there's not a description set forth in the body of</p> <p>25 your report, it's by looking at the questions that</p> <p style="text-align: right;">Page 129</p>

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<p>1 of nonresponse, to analyze the differences between 2 people that answered and people that did not answer? 3 A. No. If -- as I said earlier, if there's 4 any particular reason why those people who answered 5 would be different with respect to the question at 6 issue then, yes, that's maybe something you should 7 look into. Even though, I must say, in the 8 overwhelming majority, almost all litigation 9 surveys, it's not done. It's just not done. 10 It's -- and I think there's some research showing 11 that, in most cases, it's not a significant problem 12 or -- and it cannot be done. 13 But in this case, I don't -- I don't -- I 14 didn't hear any theory as to why it would make a 15 difference, and it was just impractical. 16 Q. So what about -- looking at the 17 difference between people that said they made the 18 decisions on their own versus people that said they 19 made their decisions in a group -- 20 A. I -- 21 Q. -- did you try to see whether that made a 22 difference? 23 A. I think at some point I looked and didn't 24 see significant differences. 25 Q. What about the difference in the -- the</p> <p style="text-align: right;">Page 162</p>	<p>1 that, but... 2 So tell me, do you know how many apps 3 were being developed in 2007 for Android? 4 A. I do know that. Not -- not -- not that 5 many, in fact. 6 Q. And how about iPhone, in 2007, how many 7 apps were being developed for iPhone? 8 A. Many more. I -- I don't -- I do 9 remember, if -- if I'm not wrong, at the beginning 10 of 2009 -- I could be wrong. There are only 2300 11 apps. By the end of -- by -- by December of 2009, 12 there are 1600 -- 16,000 apps compared to something 13 like 120,000 apps for iPhone. A big difference. 14 I know that iPhone started earlier. But, 15 in general -- and also, if you look at articles on 16 the subject, Android started rather slowly, 17 which -- which, to me, I'm not -- that's not -- 18 I -- I -- my role was to conduct the survey. 19 But if Java were so important, despite 20 the results of the survey, you would have expected 21 right away a big jump in number of Android apps. 22 That did not happen. Only after the number of 23 users increased, there you saw the number of apps 24 follow the number of users. 25 Q. So the article that -- that you</p> <p style="text-align: right;">Page 164</p>
<p>1 timing? So the people who said they started 2 developing apps long ago versus people who 3 developed recently, did you try to do any analysis 4 to see whether that -- there was differences based 5 on those people? 6 A. I did, in fact. I -- I -- in particular, 7 I was interested to see whether mentions of Java 8 were more common among those who started earlier, 9 and I found the answer is no. There is no -- 10 absolutely no correlation, which I think is -- is 11 quite informative in this case, because if someone 12 who started developing 2014 says Java was a factor, 13 and someone in 2014 or 2013 is less likely to say 14 that as someone who started in 2009, I think 15 that's -- that's relevant. 16 Q. And it could also be an effect of -- of 17 recency, correct? 18 MR. PURCELL: Object to the form. 19 THE DEPONENT: No. It's -- I think I 20 already -- we already talked about that. To the 21 extent that familiarity with Java was a factor 22 worth mentioning, it would have been mentioned. 23 This is a high-involvement important decision that 24 people have very good memory for. 25 Q. (By Ms. Feeman) I know you have a mantra on</p> <p style="text-align: right;">Page 163</p>	<p>1 mentioned, is that identified in your list of 2 materials considered? 3 A. No, I just read it, I think, yesterday or 4 the day before yesterday. I think it was maybe a 5 TechCrunch article. 6 Q. So what about today, do you know how -- 7 how many apps are being developed for Android 8 today? 9 A. I know that, in total, there are 10 1.9 million. 11 Q. So you'd agree that Android plat- -- 12 platform is far more popular today than it was in 13 2007? 14 A. Without a doubt. 15 Q. So do you remember what mobile phones 16 were like in 2007? 17 A. Kind of. 18 Q. And do you have any thoughts on how they 19 compare to phones today? 20 A. In what -- in what terms do you want me 21 to compare them? 22 Q. Well, they were very different. Do you 23 agree to that? 24 A. They are different. I mean, obviously, 25 the iPhone was a revolutionary phone. Introduced</p> <p style="text-align: right;">Page 165</p>

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<p>1 the smartphone concept. Subsequently, there's some 2 phones -- I think there was an HTC phone that -- 3 that was not all that impressive initially for 4 Android, although I don't remember it in -- 5 exactly. But at some point I think there -- there 6 was a Motorola Android phone and perhaps a Samsung 7 phone. 8 So I think that overall, despite the 9 promise of Google, if you look at the number of 10 apps, apparently application developers were not 11 all that impressed, otherwise you would see an 12 immediate jump in the number of applications. That 13 did not happen. 14 Q. So do you agree, though, that phones have 15 changed a lot between 2007 and today? 16 A. Sure. 17 Q. Do you know what the market share of 18 Android was when it launched? 19 A. The day that it launched, it was probably 20 zero. You mean in terms of sales, when it just 21 started, there were -- you know, there was no 22 Android. I mean, obviously, you need some phones 23 to -- that use Android to have market share. 24 Q. Do you know what Android's market share 25 is in 2015 -- or was in 2015?</p> <p style="text-align: right;">Page 166</p>	<p>1 for the changes in market share, when you designed 2 your survey? 3 A. No, not at all. It was irrelevant. The 4 question is what factors, in general, regardless of 5 time, influence their decisions to start writing or 6 developing apps for certain platform. And B, what 7 factors led to their decision to develop for 8 Android. 9 And there were additional -- there were 10 like this question where they rated the importance 11 of each of six factors. I thought that was 12 informative question. 13 And on top of that, there was those -- 14 there were those behavioral measures. Did they 15 actually learn Objective-C for the purpose of 16 writing for -- or writing iOS apps. Are they 17 planning to learn Swift. These are actual 18 behavioral measures, which I thought were quite 19 informative. 20 Q. So it's your position that the 21 decision-making process of app developers is 22 constant, regardless of market context. 23 Is that your position? 24 MR. PURCELL: Object to the form. 25 THE DEPONENT: The basic motives are</p> <p style="text-align: right;">Page 168</p>
<p>1 A. You mean in terms of the number of 2 phones? 3 Q. Well, do you know market share, first of 4 all? 5 A. For what? 6 Q. For the phones. 7 A. For the phone. 8 It's the biggest, I think in terms, of 9 numbers. I don't know if in terms of value -- I -- 10 iPhone tends to be more expensive. But I think if 11 you just go by units, I think Android is No. 1. 12 Q. Do you know what -- what iOS market 13 share is in 2015? 14 A. iOS? In terms of dollars or in terms 15 of -- 16 Q. In terms of phones. 17 A. In terms of units. 18 Q. Number of phones, yeah. 19 A. I don't remember the number. 20 Q. Do you know whether the relative share of 21 Android and iOS remains stable between 2008 and 22 2015? 23 A. I think that -- if I'm not wrong, Android 24 went up. 25 Q. So did -- did you do anything to account</p> <p style="text-align: right;">Page 167</p>	<p>1 rather constant over time, yes. They want profit, 2 I think, is the -- is the most important. And 3 there is a question, obviously, they -- they -- 4 they would -- they wouldn't spend infinite amount 5 of time to learn a new language. 6 But what comes loud and clear out of the 7 survey is that, by far, the most important factor 8 is sales and profit potential. If you look at 9 other studies of -- of application developers from 10 2010 and later, they reach the same conclusions. 11 Q. (By Ms. Feeman) Let's -- let's try this 12 again. Simple question. 13 Is it your position that the 14 decision-making process of app developers is 15 constant, regardless of market context? 16 MR. PURCELL: Object to the form. 17 THE DEPONENT: I -- could you read my 18 answer? I -- I just gave you an answer. I said -- 19 I -- 20 Q. (By Ms. Feeman) Your answer started -- I can 21 read it. "The basic motives are constant over time." 22 I didn't ask you about time. I asked you about market 23 context. 24 My question is, is it your position that 25 the decision-making process of app developers is</p> <p style="text-align: right;">Page 169</p>

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